

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BRABUS GmbH,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON  
SCHEDULE A HERETO,

Defendants.

Case No. 24-cv-10464

Judge Rebecca R. Pallemeyer

**PLAINTIFF'S RENEWED MOTION FOR ENTRY OF A PRELIMINARY  
INJUNCTION AGAINST DEFENDANT NOS. 1-6, 8-10, 12-17, 19-26, 28-31, 33-36, 38-43,  
45, 46, 48-51, 53-64, 66-93, 95-197 AND 199-204**

Plaintiff BRABUS GmbH hereby moves this Honorable Court for entry of a Preliminary Injunction. The scope of the Preliminary Injunction is substantially identical to the Temporary Restraining Order granted on February 6, 2025 [Dkt. No. 47], entered on February 7, 2025 [Dkt. No. 48], and extended on February 20, 2025, through March 7, 2025. [Dkt. No. 50]. A motion to extend the temporary restraining order a second time as to Defendant Nos. 112-204 was filed on March 4, 2025. [Dkt. No. 56]. To date, the Court has not ruled on the motion to extend the temporary restraining order a second time as to Defendant Nos. 112-204. Plaintiff has filed multiple motions for entry of preliminary injunction in this matter [Dkt. Nos. 53, 72]. On March 21, 2025, this Court struck the Motions for Entry of a Preliminary Injunction without prejudice [Dkt. Nos. 53, 72] and gave Plaintiff leave to submit a revised motion. [Dkt. No. 78]. In support of its Motion for Entry of a Preliminary Injunction, Plaintiff files the accompanying Memorandum of Law and Declaration of Michael A. Hierl.

Respectfully submitted,

Dated: March 28, 2025

By: s/Michael A. Hierl  
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BRABUS GmbH

### **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion was electronically filed with the Clerk of the Court, served by publication and email to the Defendants identified in Schedule A and served on all counsel of record and interested parties via the CM/ECF system on March 28, 2025.

/s/ Michael A. Hierl